

BAKER & HOSTETLER LLP
45 Rockefeller Plaza
New York, NY 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
Robertson D. Beckerlegge
Eric R. Fish
Alexa A. D'Angelo

Hearing Date: July 19, 2023, 10:00 a.m.
Opposition Deadline: July 12, 2023
Reply Deadline: July 14, 2023

*Attorneys for Irving H Picard, Trustee
for the Substantively Consolidated SIPA
Liquidation of Bernard L. Madoff Investment
Securities LLC and the Chapter 7 Estate of
Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Adv. Pro. No. 08-01789 (CGM)

Plaintiff-Applicant,

SIPA LIQUIDATION

v.

(Substantively Consolidated)

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively
Consolidated SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC and the Chapter 7 Estate of
Bernard L. Madoff,

Adv. Pro. No. 11-02540 (CGM)

Plaintiff,

v.

LION GLOBAL INVESTORS LIMITED,

Defendant.

**NOTICE OF MOTION FOR ORDER ISSUING LETTER OF REQUEST FOR THE
EXAMINATION OF DANIEL CHAN CHOONG SENG**

PLEASE TAKE NOTICE that pursuant to 28 U.S.C. § 1781, this Court's inherent authority, and in light of the comity between the United States and Singapore and upon the accompanying Motion for an Order Issuing a Letter of Request (the "Motion"), Irving H. Picard, as trustee (the "Trustee") for the liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, substantively consolidated with the Chapter 7 estate of Bernard L. Madoff, through his undersigned counsel, will move before The Honorable Cecelia G. Morris, United States Bankruptcy Judge, on July 19, 2023, at 10:00 a.m., or as soon thereafter as counsel may be heard, seeking entry of an Order Issuing a Letter of Request for Service Abroad of Judicial or Extrajudicial Documents in Civil or Commercial Matters (the "Order").

PLEASE TAKE FURTHER NOTICE that any objection to the Motion ("Objection") shall: (i) be in writing; (ii) conform to the Federal Rules of Bankruptcy Procedure, Local Bankruptcy Rules and General Orders; (iii) specify the name of the objecting party and state with specificity the basis of the Objection(s) and specific grounds therefor; (iv) be filed in accordance with the electronic filing procedures for the United States Bankruptcy Court for the Southern District of New York, with a proof of service; (v) to be served upon (a) Baker & Hostetler LLP, counsel for the Trustee, 45 Rockefeller Plaza, New York, New York 10111, Attn: Robertson D. Beckerlegge, Esq.; and (b) the Securities Investor Protection Corporation, 1667 K Street, NW, Suite 1000, Washington, DC 20006-1620, Attn: Kevin H. Bell, Esq., so as to be received no later than July 12, 2023.

PLEASE TAKE FURTHER NOTICE that failure to timely file an Objection may result in the entry of an order granting the relief requested in the Motion without further notice to any party or opportunity to be heard.

PLEASE TAKE FURTHER NOTICE that the Trustee shall file a reply, if any, by no later than July 14, 2023.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith.

The Trustee has made no prior request to this Court or to any other court for the relief requested by the Motion.

Date: June 23, 2023
New York, New York

By: /s/ Robertson D. Beckerlegge
Baker & Hostetler LLP
45 Rockefeller Plaza
New York, NY 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
Email: dsheehan@bakerlaw.com
Robertson D. Beckerlegge
Email: rbeckerlegge@bakerlaw.com
Eric R. Fish
Email: efish@bakerlaw.com
Alexa A. D'Angelo
Email: adangelo@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC and
the Chapter 7 Estate of Bernard L. Madoff*